

FILED

FEB 24 2016

U.S. COURT OF
FEDERAL CLAIMS

ORIGINAL

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest_____
HUMAN RESOURCES TECHNOLOGIES,
INC.,

Plaintiff,

v.

THE UNITED STATES,

Defendant.
_____Case No. 16-260 C**PLAINTIFF'S MOTION FOR INJUNCTIVE RELIEF**

Pursuant to Rule 65 of the Rules of the United States Court of Federal Claims, Plaintiff Human Resources Technologies, Inc. ("HRTec") respectfully requests that this Court issue a temporary restraining order and preliminary and permanent injunctive relief prohibiting the Defendant from proceeding with task order SN01 (the "Task Order") under Contract No. FA873213D001 (the "Contract") and any options thereto pending resolution of this matter.

As was supported by the Complaint and the Memorandum attached hereto, injunctive relief is necessary and appropriate in the case to prevent the Defendant from exceeding the scope of the Contract. HRTec has shown a likelihood of success on the merits of its claims, and that it has suffered and continues to suffer irreparable harm due to the lost opportunity to compete as well as lost profits. The balance of hardships clearly tilts in favor of granting the injunction, which would also serve the public interest.

Therefore, HRTec respectfully requests this Honorable Court GRANT its motion to temporarily restrain and preliminarily and permanently enjoin the United States Air Force from proceeding with the award and performance of the Task Order and any options thereto.

DATE: February 24, 2016

/s/ Lee Dougherty

Lee Dougherty
Katherine A. Straw
OFFIT KURMAN, P.A.
8000 Towers Crescent Drive, Suite 1500
Tysons Corner, Virginia 22182
Tel: (703) 745-1819
Fax: (703) 745-1835
ldougherty@offitkurman.com